

ENFORCEMENT TEARDOWN

What the FAA actually asked for.

Six Part 135 enforcement actions since March 2024, the exact record that failed in each, the regulation behind it, and an honest account of which ones a records system would have caught.

6

ACTIONS EXAMINED

\$1.16M

IN PROPOSED FINES

0

CAUSED BY AN ACCIDENT

THE PREMISE

The FAA is not investigating. It is reading.

Every case in this document was built out of the operator's own files. Not one of the six began with a crash. The agency asked for a record, and the record did not support the flight that had already happened.

So this is not a list of violations. For each case it names the specific record that failed, the regulation that governs it, how the gap survived flight after flight, and then the number that actually matters: how long the condition ran before anybody noticed.

32 flights. 83 flights. 315 flights. 170 flights. Five years. Not one was caught on flight two.

The exposure is not the violation. It is the interval between the violation and the moment someone finds it. Every operator in this document had the information required to catch the problem. In each case it sat in a file that nobody had a reason to open.

AN HONEST NOTE ON THE VERDICT IN EACH CASE

I build compliance records software, so the obvious move would be to claim all six were preventable by buying it. They were not. Two would have surfaced clearly. Two would have surfaced partially. Two would not have been caught by any records system, mine included, and I say so plainly on those pages. A tool that claims to catch everything is not worth the disc it sits on.

HOW TO READ THE CITATIONS

The FAA's newsroom announcements describe each violation in plain English; they do not print regulation numbers. The 14 CFR sections shown in this report are the governing requirements mapped to the conduct the FAA described, with the rule text verified against the electronic Code of Federal Regulations. Where the FAA did not state a detail — an exact subsection, an Airworthiness Directive number, or how a gap was discovered — this report does not invent one. Except where noted, every penalty is **proposed, not final**, and the operator has the right to respond.

The honest scorecard

Six cases. Two a records system surfaces clearly, two it helps with, two it does not touch.

OPERATOR	THE RECORD THAT FAILED	GOVERNS	RAN FOR	FILEFLO
Southern Airways	SIC competency check & required testing	\$135.293	32 flights	SURFACES
Private Jets	PIC / SIC / type testing in 12 months	\$135.293	Several flights	SURFACES
StarFlite	Training records, falsified by management	\$135.293 · \$119.69	5 years	PARTIAL
Brazos Valley	AD compliance & mechanic method training	\$39.7 · \$43.13	83 flights	PARTIAL
Gem Air	Engine overhaul & inspection past due	\$135.421 · \$91.7	315 flights	NO
Planet Nine	Flight plans, permits, manual adherence	\$135.21	21 filings	NO

WHAT THE PATTERN SAYS

Three of the six turn on crew qualification currency. Half the enforcement actions came down to whether a specific person was current, in a specific seat, on a specific date, and whether anyone checked before the trip went. That is the failure mode that runs longest, because nothing about it is visible. An overdue engine eventually gets noticed. A gear failure announces itself. An expired competency check produces no symptom at all, and the exposure compounds one leg at a time until someone reads the file.

Each record, the rule, and how long it ran

CASE 01 / CREW QUALIFICATION

SURFACES

Southern Airways Express

Palm Beach, FL · Announced March 2024 · \$280,000 proposed

Three Cessna Caravans flew 32 commercial flights between Washington Dulles and Morgantown, West Virginia with a co-pilot who had not passed recent written or oral tests, or a competency check. The FAA alleged the operation was careless or reckless and endangered life and property.

THE REQUIREMENT

14 CFR 135.293(a)

Before a certificate holder may use a pilot, that pilot must have passed a written or oral knowledge test — regulations, the aircraft, procedures, performance, weather — given by the Administrator or an authorized check pilot.

14 CFR 135.293(b)

And a competency check demonstrating practical skills in that class of aircraft.

Currency window: both must fall within the preceding 12 calendar months of the flight.

SHOULD HAVE SHOWN For each of the 32 flights, a passing written-or-oral test and competency check for the co-pilot, each dated inside his 12-month anniversary.

WHAT WAS THERE By the company's own account, a first officer who "inadvertently flew past his anniversary deadline for a recurrent check-ride." The currency date had lapsed.

HOW IT PERSISTED §135.293 currency is a calendar computation keyed to each pilot's individual anniversary, not a per-flight gate. Nothing in the daily scheduling loop recomputed the 12-month lookback, so once the date passed he simply kept being rostered — across three aircraft and 32 flights.

HOW IT SURFACED The operator caught it itself on October 13, 2022, the day after the flights, pulled the first officer, and he passed his check. A records reconciliation, not an incident.

32 revenue flights Inside a twelve-day window, October 1–12, 2022.

What the FAA charged: careless or reckless operation endangering life or property (14 CFR 91.13(a)), layered on the §135.293 currency failures. A proposed \$280,000 civil penalty — not a certificate action, not falsification.

FileFlo tracks this exact object.

Each crewmember's required qualification events are held as dated records, anchored to the date of the regulatory event itself rather than the day a file was uploaded, and measured against §135.293. That co-pilot's competency check would have read as not current, by name, with the paragraph it comes from.

What it would not do: stop the assignment. FileFlo is not in the crew scheduling or release path. It tells you the person is not current. A human still has to act on that.

The operator's response: it caught and corrected the lapse itself the day after the flights and characterized it as an inadvertent miss on a single first officer.

ASK ABOUT YOUR OWN OPERATION

For every crewmember on next week's schedule, what is the date of their last competency check, and who verified it before the trip was assigned?

CASE 02 / MAINTENANCE EXECUTION

PARTIAL

Brazos Valley Air Charter

Tulsa, OK · Announced January 2025 · \$202,450 proposed

A mechanic inspected a Piaggio P180 main landing gear component for cracks without using the method the Airworthiness Directive specified. He had not been trained in that method and had not been given the required tools and equipment. The aircraft then flew roughly 83 flights over five months. On the last one, the right main landing gear failed on landing at Cincinnati Municipal / Lunken.

THE REQUIREMENT

14 CFR 43.13(a)

Anyone performing an inspection must use the methods and techniques in the manufacturer's manual and the tools and equipment necessary to complete the work — using special equipment the maker specifies where it is called for.

14 CFR 39.7 · 91.403(a)

Operating a product that does not meet an applicable Airworthiness Directive is a violation, and the operator — not only the mechanic — is responsible for AD compliance.

14 CFR 91.7(a)

No one may operate an aircraft that is not in an airworthy condition. An unsatisfied AD makes it unairworthy by definition.

No interval here: this is a per-flight condition, not a recurring lookback.

SHOULD HAVE SHOWN	The AD inspection performed by the exact method the AD prescribes, with the required tools, by someone trained in it, returned to service — establishing the component was actually crack-free.
WHAT WAS THERE	A paper "done." The AD was recorded as satisfied, but the inspection used the wrong method by an untrained, under-equipped mechanic — an attestation over work that could not reliably find the crack it existed to catch.
HOW IT PERSISTED	A closed AD sign-off is treated as final, not re-verified before each flight. The defect was an internal crack, invisible on a walkaround, detectable only by the very method that was skipped. Paperwork said "satisfied," so it rode along for ~83 flights.
HOW IT SURFACED	Physics, not an audit. The crack propagated to failure and the right main gear failed on landing at Lunken — revealing the AD had never truly been met.

83 flights, five months October 11, 2022 to March 17, 2023.

What the FAA charged: improper maintenance resulting in operation of an unairworthy aircraft. A proposed \$202,450 civil penalty. Note: although the AD was "recorded as satisfied when it was not," the public release frames this as improper maintenance, *not* a falsification charge.

The people half, yes. The procedure half, no.

FileFlo holds maintenance personnel training records on the same footing as crew records. If qualification in that inspection method was a required, dated item for that mechanic, it would have read as missing before he was the one signing.

What it would not do: know that the inspection performed used the wrong method. No records platform observes the work. That gap belongs to maintenance QA and procedural control, and any vendor who tells you otherwise is selling.

ASK ABOUT YOUR OWN OPERATION

When someone signs off an AD-mandated inspection, where is the record showing they were trained and equipped for that specific method?

CASE 03 / COMPONENT LIMITS

NO

Gem Air

Salmon, ID · Announced May 2024 · \$239,000 proposed

A Cessna Caravan flew 315 flights with a required engine overhaul overdue. A Cessna T206 flew with an overdue engine exhaust inspection. A Britten-Norman BN-2A departed Boise for Salmon without enough fuel to complete the flight and made an emergency landing after the right engine stopped.

THE REQUIREMENT

14 CFR 135.421

The certificate holder must maintain each engine per the manufacturer's recommended program or an approved program. Engine time-between-overhaul limits and required inspections live inside that program.

Limit type: hours and cycles, not calendar — set by the maintenance program, not a fixed date.

14 CFR 91.7(a)

An engine flown past its overhaul limit is not airworthy, so each such flight violates the airworthiness rule.

14 CFR 135.209 / 135.223

Part 135 fuel-reserve minimums — 30 minutes beyond destination (VFR day) or destination-plus-alternate-plus-45 minutes (IFR). Departing without enough fuel to reach Salmon breached the floor.

SHOULD HAVE SHOWN	The Caravan's engine overhauled before its limit, the T206's exhaust inspection signed within its interval, and fuel loaded to reach Salmon plus reserve.
WHAT WAS THERE	315 Caravan flights with the overhaul overdue, a T206 flown with the exhaust inspection overdue, and a BN-2A dispatched short of fuel.
HOW IT PERSISTED	A time/cycle limit is a records-tracked clock, not a cockpit warning. The engine keeps running normally after it rolls past due, so nothing in daily operation stops the aircraft. Every one of the 315 flights looked routine.
HOW IT SURFACED	The fuel violation surfaced in flight — the right engine stopped en route, forcing the emergency landing. The FAA did not state how the two maintenance lapses were found.

315 flights May 22 to November 28, 2022. Six months on one airframe.

What the FAA charged: careless or reckless operation endangering life and property (14 CFR 91.13(a)). A proposed \$239,000 civil penalty.

This is a maintenance tracking problem, not a records problem.

An engine overhaul comes due on hours and cycles that accrue with every leg flown. That belongs to a maintenance tracking program reading live utilization. FileFlo is a compliance records and currency system. It is not a maintenance tracker and does not pretend to be one. Where the line falls: date-driven items, inspections and certificates with calendar expirations, are ours. Hour- and cycle-driven component limits are not.

ASK ABOUT YOUR OWN OPERATION

What tells you a component is approaching its limit, and does that signal reach the person building the schedule, or only the person doing the maintenance?

CASE 04 / DOCUMENT TO OPERATION DRIFT

NO

Planet Nine Private Air

Van Nuys, CA · Announced May 2026 · \$336,000 proposed

The FAA alleges the company filed 21 inaccurate international flight plans describing passenger charter flights as general aviation, failed to obtain overflight or landing permits, and failed to follow its own Oceanic and International Procedures Manual across eight countries.

THE REQUIREMENT

14 CFR 135.21

A certificate holder must prepare and keep current a manual — here the FAA-accepted Oceanic and International Procedures Manual — and its personnel must actually use that manual in conducting operations.

No interval: a continuous "follow your accepted manual" obligation.

14 CFR 91.703

A U.S. operator flying abroad must comply with the flight rules and permit requirements in force in each foreign country and with ICAO Annex 2.

SHOULD HAVE SHOWN	For each leg, a flight plan correctly identifying a commercial charter, matched by valid overflight and landing permits, executed by the manual's own permitting procedure.
WHAT WAS THERE	21 plans describing charter flights as general aviation, missing permits, flown contrary to the operator's own accepted manual.
HOW IT PERSISTED	Filing a flight as "general aviation" routes it around the heightened permit and documentation scrutiny a charter triggers abroad, so each leg cleared as filed. Because the internal manual step was skipped, there was no internal checkpoint to catch the mismatch either.
HOW IT SURFACED	An FAA review reconstructed the filed plans against the flights actually flown and the permits actually held. No accident or injury — a documentary gap exposed on paper.

21 flight plans

November 2023 to August 2024, across eight countries. Roughly \$16,000 per document.

What the FAA charged: careless or reckless operation plus violation of international operating requirements (14 CFR 91.13(a); 91.703 / 135.21). A proposed \$336,000 civil penalty. The FAA alleges the misfiling was intentional, but the public release does *not* name a falsification charge.

Nothing in a records system sees this.

Flight plan content, permit acquisition, and whether the crew followed a procedure on the day are operational acts, not record states. A compliance records platform can confirm your manual is current and controlled. It cannot observe whether anyone flew the way it says. The honest reading: this case is an argument for procedural audit and internal evaluation, not for software. It is here because leaving it out would make the other five look better than they should.

The operator's response: Planet Nine disputes the allegations, calling them isolated administrative issues affecting a small fraction of its segments during the audit period.

ASK ABOUT YOUR OWN OPERATION

Where does your manual say one thing while your operation reliably does another? That difference is chargeable on its own.

CASE 05 / CREW QUALIFICATION

SURFACES

Private Jets, Inc.

Bethany, OK · Announced June 2026 · \$104,000 proposed

The FAA alleges an employee piloted several flights in April 2025 without having completed the testing required to serve as pilot in command, as second in command, or in the aircraft type operated, within the preceding twelve months.

THE REQUIREMENT

14 CFR 135.293(a)–(b)

The same initial and recurrent testing behind Case 01: a written or oral knowledge test and a competency check, current for the pilot and specific to the aircraft type flown. The rule applies to PIC and SIC service alike.

Currency window: within the preceding 12 calendar months, for each type operated.

SHOULD HAVE SHOWN	For each flight, a passed §135.293 test and check dated within 12 months, covering the exact type and the role served.
WHAT WAS THERE	Per the allegation, the required 12-month testing had not been completed for PIC, for SIC, or for the aircraft type — the currency was lapsed or absent.
HOW IT PERSISTED	A lapsed §135.293 check is invisible at dispatch unless something actively cross-checks each pilot's testing currency against the assigned type before release. The FAA did not describe the internal breakdown, so none is asserted here.
HOW IT SURFACED	The FAA did not state how the gap was found. It is not asserted.

Over a year, to the letter

Flights in April 2025. Enforcement announced June 2026.

What the FAA charged: a proposed \$104,000 civil penalty for operating in violation of the §135.293 pilot-testing requirements — evaluated by seat and by type. Not charged as careless/reckless or falsification in the public release.

This is the shape of the problem FileFlo was built for.

Currency is not one flag per pilot. It resolves per person, per seat, and per type, and it is computed from the date of the qualifying event rather than assumed from the presence of a file. A pilot missing type-specific testing reads as not current for that type while remaining current elsewhere, and the gap is named with the requirement behind it.

What it would not do: tell you a document is unreadable and then guess anyway. When a date cannot be established from the record, FileFlo says so rather than assuming currency.

The operator's response: Private Jets contests the allegation and points to its multi-decade safety record.

ASK ABOUT YOUR OWN OPERATION

Your answer has to be right per person, per seat, and per type. Can you produce all three for a given date without opening a folder?

CASE 06 / FALSIFICATION

PARTIAL

StarFlite Aviation

Houston, TX · February 2026 · Air carrier certificate revoked

The FAA alleges management personnel made false entries in the training records of at least ten pilots, including the chief pilot, showing check rides and competency checks in various aircraft that never took place. The company used unqualified pilots on at least 170 flights. The agency also found it lacked the qualified management personnel required to run the operation.

THE REQUIREMENT

14 CFR 135.293

The recurrent competency check and knowledge test the falsified entries claimed to document — a check given by an authorized check pilot, in the type flown, within the preceding 12 months.

14 CFR 135.63(a)(4)

The certificate holder must keep an individual record for each pilot showing the date and result of each required check and the aircraft type. This defines what a truthful record must contain — the record management is alleged to have fabricated.

14 CFR 119.69

A Part 135 operator must have qualified people in required management positions (Director of Operations, Chief Pilot, Director of Maintenance). This is the "lacked qualified management personnel" finding.

SHOULD HAVE SHOWN	For each pilot, a competency check that physically took place, given by an authorized check pilot, within 12 months, in the type flown — each dated entry corresponding to a real event.
WHAT WAS THERE	Numerous false entries stating check rides and competency checks had occurred when they never did — for at least ten pilots, including the chief pilot. The paperwork read complete; the checks did not happen.
HOW IT PERSISTED	The entries were created and certified by the operator's own management — the very people responsible for training oversight — so the control that should have caught the gap was the source of the fraud. A complete, dated, in-window record looks compliant to anyone reading the file. It ran five years.
HOW IT SURFACED	An FAA review determined the recorded checks never took place. The exact trigger is not stated in the announcement.

Five years

November 2019 to November 2024. At least 170 flights. The business is gone.

What the FAA charged: an Emergency Order of Revocation of the air carrier certificate for lack of qualification — effective immediately, appealable to the NTSB (49 U.S.C. 44709; 46105(c)). Under long-standing FAA/NTSB doctrine, intentional falsification shows a lack of the care and responsibility required to hold a certificate, which supports revocation rather than a fine.

A REGULATORY-TIMING NOTE FOR THE LAWYERS

During the conduct window (2019–2024), Part 135 had no dedicated falsification rule like Part 121's. The FAA's consolidated falsification rule (14 CFR Part 3, Subpart D) did not take effect until November 2025 — after the conduct here. So the falsification is best understood as reaching the certificate through the lack-of-qualification revocation doctrine and the underlying §135.293 and §119.69 violations, not through a Part 135 falsification rule in force at the time.

It raises the cost of the lie. It does not detect one.

In FileFlo a requirement is satisfied by an underlying document with a readable date, not by a checkbox in a spreadsheet or a line in a training matrix. Fabricating a record means producing an actual artifact for every entry, and every entry is attributable and dated.

What it would not do: catch a forged document that looks correct. If management manufactures a signed check ride form, it will read as satisfied. Software does not solve for a chief pilot who is in on it. Independent verification does.

ASK ABOUT YOUR OWN OPERATION

Who can create or edit a training record in your shop, and is there any independent trace that the event actually happened?

Five ways a record fails

The six cases are not six unrelated mistakes. They are five distinct failure modes, and which one you are looking at decides whether any records system can catch it.

FAILURE MODE	WHAT IT IS	CASES	GOVERNS	RECORDS SYSTEM
Currency lapse	A real qualification simply expired against its clock.	Southern, Private Jets	\$135.293	SURFACES
Execution gap	The record says the work was done; it was not done correctly.	Brazos Valley	\$43.13	PARTIAL
Time/cycle drift	A limit measured in hours or cycles, not calendar, quietly passed.	Gem Air	\$135.421	NO
Practice drift	The accepted manual says one thing; the operation reliably did another.	Planet Nine	\$135.21	NO
Falsification	The record was fabricated to show an event that never happened.	StarFlite	\$135.293 \$119.69	PARTIAL

The pattern is not random. A records system is strong exactly where the failure is a **date against a rule** — currency lapse — because that is a computation, not a judgment. It is partial where the record is real but the underlying event was flawed or fabricated: it can prove a document exists and carries a date, but it cannot witness the work or unmask a convincing forgery. It is blind where the failure lives in a different system entirely — a maintenance tracker reading live hours and cycles, or an operational-control process that governs how a crew actually flies. Honest software knows which column it is in.

The exposure is the interval

In every case, the violation was cheap on the day it started. What made it a six-figure event was time — the gap between the violation and the moment someone finally read the file.

OPERATOR	RECORD THAT FAILED	INTERVAL	WHAT FINALLY SURFACED IT
Southern Airways	SIC currency (§135.293)	32 flights / 12 days	Operator's own audit, next day
Brazos Valley	AD execution (§43.13)	83 flights / 5 months	Gear failed on landing
Gem Air	Engine overhaul limit (§135.421)	315 flights / 6 months	In-flight engine stoppage (fuel)
Planet Nine	Manual / permit drift (§135.21)	21 filings / ~10 months	FAA audit reconstruction
Private Jets	Pilot testing (§135.293)	April 2025 → June 2026	Not stated by the FAA
StarFlite	Falsified checks (§135.293)	5 years / 170 flights	FAA investigation

Read the last column. The cases that ended fastest are the ones with a **physical symptom** — a gear that failed, an engine that quit. Those failures recruit the world to notice them, so they are self-limiting. The cases that ran longest are the ones with **no symptom at all**: a qualification that lapsed, a check that was invented. The airplane flew normally, the passengers arrived, and nothing announced the gap. StarFlite's fabrication ran five years because a fabricated record produces no warning light. The uncomfortable conclusion is that the failures a records system is best at catching are exactly the ones that would otherwise run the longest, because they are the ones nothing else will surface.

One question per failure mode

Take the five failure modes and turn each into a question about your own operation. If you cannot answer one without a phone call, that is your gap.

- 1 Currency lapse** — For every pilot on next week's schedule, can you produce the date of their last \$135.293 test and competency check, per seat and per type, without opening a folder?
- 2 Execution gap** — When someone signs off an AD-mandated or manufacturer-required inspection, where is the record that they were trained and equipped for that specific method?
- 3 Time/cycle drift** — What tells you an engine or component is approaching its hour/cycle limit, and does that signal reach the person building the schedule, not just maintenance?
- 4 Practice drift** — Where does your accepted manual say one thing while your operation reliably does another? That difference is chargeable on its own.
- 5 Falsification** — Who can create or edit a training record in your shop, and is there any independent trace that the event it records actually happened?

THE FIVE-MINUTE VERSION

Pick a flight you ran ninety days ago. Answer without opening a filing cabinet or calling anyone: Who occupied each seat, and was each current for that seat and type on that date? Was the aircraft inside every inspection, AD, and component limit? Who released the trip, and are they authorized in your manual to do so? Does the record proving all of it still exist, dated and signed?

If any answer required a phone call to one specific person, that person is your compliance system. That works right up until they are on vacation, or the schedule moves at 0500, or the request arrives about a flight from eighteen months ago.

What FileFlo does

FileFlo reads the documents an operation already has, holds them in one place, and keeps a live answer to a narrow question: is this requirement satisfied for this person or this aircraft, as of today, and what is the rule behind it. Currency is computed from the date of the regulatory event, not the day a file was uploaded. When a date cannot be read from a document, it says so instead of guessing.

It is a proof layer. It does not fly the schedule, dispatch the trip, or replace a maintenance tracking program or a safety management system. The two cases in this document where it would not have helped are named on purpose.

If it is useful, send me one thing you are unsure about in your own records and I will tell you what an inspector would ask for that is not there. No deck, no demo required.

Chad Griffith · Founder, FileFlo · chad@getfileflo.com

SOURCES & METHOD

Every case is built from the FAA's own newsroom announcements ([faa.gov/newsroom](https://www.faa.gov/newsroom)). The FAA describes each violation in plain English; the 14 CFR sections in this report are the governing requirements mapped to that conduct and verified against the electronic Code of Federal Regulations (eCFR / Cornell LII). The announcements do not print section numbers.

- [FAA: \\$280,000 penalty against Southern Airways Express](#)
- [FAA: \\$202,450 civil penalty against Brazos Valley Air Charter, Tulsa, Oklahoma](#)
- [FAA: \\$239,000 civil penalty against Idaho-based Gem Air](#)
- [FAA: \\$336,000 fine against Planet Nine Private Air for alleged international flight violations](#)
- [FAA: \\$104,000 fine against Private Jets, Inc. for alleged pilot training violations](#)
- [FAA: emergency order to immediately revoke the air carrier certificate of StarFlite Aviation](#)

All published at [faa.gov/newsroom](https://www.faa.gov/newsroom). Allegations described here are as stated by the FAA. Except for StarFlite (certificate revoked by emergency order), every penalty is proposed, not final, and the operator has the right to respond. Operator responses are the companies' own public statements.